

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

X
BRUCE A. BLAKEMAN, in his capacity as
County Executive of the County of Nassau,
COUNTY OF NASSAU, MARC MULLEN
as parent and natural guardian of K.E.M.,
an infant under the age of eighteen years,
and JEANINE MULLEN, as parent and
natural guardians of K.E.M., an infant under
the age of eighteen years,

Plaintiffs,

-against-

LETITIA JAMES, as Attorney General of the
State of New York, STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL,
and STATE OF NEW YORK,

Defendants.
_____X

AFFIDAVIT

Case No. 2:24-cv-01655

STATE OF NEW YORK

ss.:

COUNTY OF NASSAU

I, Bruce A. Blakeman, being duly sworn, deposes and says:

1. I Bruce A. Blakeman in my capacity as County Executive of the County of Nassau, as a plaintiff in the above-entitled action, respectfully moves this court to order defendants to show cause why they should not be enjoined from taking further legal action against the County of Nassau, its agencies, departments and/or employees, related to County Executive Order Number 2-2024.
2. As explained in the accompanying memorandum of law, I have no adequate remedy at law because the Attorney General – Letitia James – threatened immediate legal action if Executive Order 2-2024 was not rescinded.

3. Unless this Order to Show Cause is issued, the County of Nassau will suffer immediate and irreparable injury, loss, and damage in that women and girls in Nassau County will be discriminated against and their constitutional rights under the United States Constitution will be violated.
4. Specifically, women and girls will not receive equal and fair opportunities to obtain recognition and accolades, college scholarships, and numerous other long-term benefits that result from participating and competing in athletic endeavors; women and girls will not have access to a supportive and safe environment for the purpose of engaging in sports; and biological males will have an unfair advantage over women and girls in sports.
5. I declare under penalty of perjury that the foregoing is true and correct.
6. I adopt the arguments and assertions made in my attorneys' memorandum of law.
7. I have read my attorney's memorandum of law and believe that the Court should grant the Plaintiffs the relief requested therein.

WHEREFORE, I respectfully request that the Court grant the within relief requested and such other and further relief as to this Court may deem just and proper.

Dated: Mineola, New York
March 7, 2024

A handwritten signature in black ink, appearing to read 'B. Blakeman', written over a horizontal line.

Bruce A. Blakeman
Nassau County Executive

Sworn to before me this

March 7, 2024

Tricia F. Formato

Notary Public

TRICIA F. FORMATO
Notary Public, State of New York
No. 01FO6261797
Qualified in Nassau County
Commission Expires May 14, 2024